

FILED

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SEP 13 2012

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISIONTHOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

ABRAHAM BROWN,
also known as "AB;"KENNETH TAYLOR,
also known as "T" and "Tango;"ALFRED WASHINGTON,
also known as "Pooh" and "Demon;"DWAINE JONES,
also known as "Nasty;" and

CHRISTOPHER DAVIS

) No. 12 CR 632

JUDGE CASTILLO

) Violations: Title 18, United States
) Code, Sections 924(c)(1)(A) and
) (c)(1)(B)(i), and 1951(a); and Title 21,
) United States Code, Section 846

MAGISTRATE JUDGE FINNEGAN

COUNT ONE

The SPECIAL SEPTEMBER 2012 GRAND JURY charges:

1. Beginning no later than on or about July 10, 2012, and continuing to on or about August 14, 2012, at Lyons, in the Northern District of Illinois, Eastern Division, and elsewhere,

ABRAHAM BROWN,
also known as "AB;"
KENNETH TAYLOR,
also known as "T" and "Tango;"
ALFRED WASHINGTON,
also known as "Pooh" and "Demon;"
DWAINE JONES,
also known as "Nasty;" and
CHRISTOPHER DAVIS

defendants herein, did conspire with each other and with others known and unknown to the Grand Jury, to obstruct, delay, and affect commerce and the movement of any article in

commerce by robbery, as "robbery" and "commerce" are defined in Title 18, United States Code, Section 1951(b), namely to steal cocaine by using force and violence from people whom defendants believed to be involved in the distribution of narcotics, in violation of Title 18, United States Code, Section 1951(a).

2. It was part of the conspiracy that defendant JONES and BROWN recruited defendants TAYLOR, WASHINGTON, and DAVIS to participate in the robbing of individuals whom defendants believed to be in possession of kilogram-quantities of cocaine.

3. It was further part of the conspiracy that defendants BROWN, TAYLOR, WASHINGTON, JONES, and DAVIS agreed to rob such individuals and further agreed to unlawfully enter a house where defendants believed such individuals possessed and stored cocaine.

4. It was further part of the conspiracy that defendants BROWN, TAYLOR, WASHINGTON, and JONES agreed to use and cause to be used firearms during the robbery.

5. It was further part of the conspiracy that defendants BROWN, TAYLOR, WASHINGTON, and JONES agreed to use materials to bind and restrain the individuals whom defendants believed to be in possession of kilogram-quantities of cocaine during the robbery.

6. It was further part of the conspiracy that defendants BROWN, TAYLOR, WASHINGTON, JONES, and DAVIS did misrepresent, conceal, hide, and cause to be hidden the purposes of acts done in furtherance of the conspiracy.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

On or about August 14, 2012, at Lyons, in the Northern District of Illinois, Eastern Division, and elsewhere,

ABRAHAM BROWN,
also known as "AB;"
KENNETH TAYLOR,
also known as "T" and "Tango;"
ALFRED WASHINGTON,
also known as "Pooh" and "Demon;"
DWAINE JONES,
also known as "Nasty;" and
CHRISTOPHER DAVIS;

defendants herein, did knowingly attempt to obstruct, delay, and affect commerce, and the movement of articles and commodities in such commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), namely, by attempting to steal cocaine through force and violence from people whom defendants believed to be involved in the distribution of narcotics;

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

Beginning no later than on or about July 10, 2012, and continuing to on or about August 14, 2012, at Lyons, in the Northern District of Illinois, Eastern Division, and elsewhere,

ABRAHAM BROWN,
also known as "AB;"
KENNETH TAYLOR,
also known as "T" and "Tango;"
ALFRED WASHINGTON,
also known as "Pooh" and "Demon;"
DWAINE JONES,
also known as "Nasty;" and
CHRISTOPHER DAVIS

defendants herein, conspired with each other and with others known and unknown to the Grand Jury knowingly and intentionally to possess with intent to distribute a controlled substance, namely, five kilograms or more of a mixture and substance containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

All in violation of Title 21, United States Code, Section 846.

COUNT FOUR

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

On or about August 14, 2012, at Lyons, in the Northern District of Illinois, Eastern Division, and elsewhere,

ABRAHAM BROWN,
also known as "AB;"
KENNETH TAYLOR,
also known as "T" and "Tango;"
ALFRED WASHINGTON,
also known as "Pooh" and "Demon;"
DWAINE JONES,
also known as "Nasty;" and
CHRISTOPHER DAVIS

defendants herein, did attempt to knowingly and intentionally possess with intent to distribute a controlled substance, namely, five kilograms or more of a mixture and substance containing cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT FIVE

The SPECIAL SEPTEMBER 2012 GRAND JURY further charges:

On or about August 14, 2012, at Lyons, in the Northern District of Illinois, Eastern Division, and elsewhere,

ABRAHAM BROWN,
also known as "AB;"
KENNETH TAYLOR,
also known as "T" and "Tango;"
ALFRED WASHINGTON,
also known as "Pooh" and "Demon;" and
DWAINE JONES,
also known as "Nasty;"

defendants herein, knowingly possessed a firearm, namely:

- (1) a loaded Lorcin 9-mm semi-automatic handgun, bearing serial number L051673;
- (2) a loaded Smith & Wesson 9-mm semi-automatic handgun, bearing serial number DTF4712; and
- (3) a short-barreled shotgun, namely, a loaded Boito 12-gauge, double-barreled shotgun, bearing serial number 172908;

in furtherance of a crime of violence and a drug trafficking crime for which they may each be prosecuted in a court of the United States, namely, violations of Title 18, United States Code, Section 1951(a), as set forth in Counts One and Two of this Indictment, violations of

Title 21, United States Code, Section 846, as set forth in Count Three and Four of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A), (c)(1)(B)(i), and
2.

FORFEITURE ALLEGATION ONE

The SPECIAL SEPTEMBER 2012 GRAND JURY further alleges:

1. The allegations of Counts Three and Four of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Section 846, as alleged in Counts Three and Four of the Indictment,

ABRAHAM BROWN,
also known as "AB;"
KENNETH TAYLOR,
also known as "T;"
ALFRED WASHINGTON,
also known as "Pooh," and
DWAINE JONES,
also known as "Nasty,"

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853(a)(2), any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violations.

3. The interests of the defendants subject to forfeiture are:

- (1) a Lorcin 9-mm semi-automatic handgun, bearing serial number L051673, and associated ammunition;
- (2) a Smith & Wesson 9-mm semi-automatic handgun, bearing serial number DTF4712, and associated ammunition; and

- (3) a short-barreled shotgun, namely, a loaded Boito 12-gauge, double-barreled shotgun, bearing serial number 172908, and associated ammunition;

All pursuant to Title 21, United States Code, Section 853(a)(2).

FORFEITURE ALLEGATION TWO

The SPECIAL SEPTEMBER 2012 GRAND JURY further alleges:

1. The allegations in Count Five of this Indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. As a result of their violation of Title 18, United States Code, Section 924(c), as alleged Count Five of the Indictment,

ABRAHAM BROWN,
also known as "AB;"
KENNETH TAYLOR,
also known as "T;"
ALFRED WASHINGTON,
also known as "Pooh," and
DWAINE JONES,
also known as "Nasty,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all right, title, and interest they may have in any property involved in the charged offense.

3. The property of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), is:

- (1) a Lorcin 9-mm semi-automatic handgun, bearing serial number L051673, and associated ammunition;
- (2) a Smith & Wesson 9-mm semi-automatic handgun, bearing serial number DTF4712, and associated ammunition; and

- (3) a short-barreled shotgun, namely, a loaded Boito 12-gauge, double-barreled shotgun, bearing serial number 172908, and associated ammunition;

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY